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Feb. 5, 2016

US Magistrate Judge James B. Clark, III
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ

via ecf

Re: Peterson v. AFLAC, Docket No. 2:15-cv-03410-CCC-JBC

Dear Judge Clark:

My firm represent plaintiffs in this action. I am writing with the defendant AFLAC's consent.

Your Honor recently changed the deadline for the parties to bring any discovery deficiencies to the court's attention.

Defendant identified some issues with plaintiff's discovery answers and plaintiff has also had some issues with defendant's discovery issues. Today is the deadline to inform the court about them.

However, in the interim between the court's order as to discovery deadlines, Judge Cecchi granted plaintiff's motion to amend the complaint, and the defendant was served with the second amended complaint. The defendant sought and was granted a clerk's

extension of time to answer, and so has not answered the complaint yet.

Today I spoke to my client and found out that he has some additional documents that he thought he had given to me but had not. I need some time to process these documents to provide them to the defendant. Further, during the parties' meet and confer session held to discuss discovery, plaintiff also agreed to supplement certain answers to AFLAC's interrogatories and we are working on that.

In addition, the second amended complaint may raise some discovery issues and until the defendant answers same, I may not be fully aware of those issues.

Therefore, the parties are requesting that the court revisit the issue of discovery compliance until after AFLAC answers the second amended complaint. Perhaps the court would entertain a phone conference in the week following the date defendant answers, which will be Feb. 26, 2016.

Thank you for your kind attention to this matter.

Very truly yours,

s/Elizabeth T. Foster
Attorney for Plaintiff

cc: All counsel of record

The deadline to bring discovery disputes to the Court's attention is extended to April 15, 2016.

SO ORDERED

s/James B. Clark

James B. Clark, U.S.M.J.

Date: 2/11/16